

IN THE UNITED STATES DISTRICT COURT  
FOR THE DIVISION OF SOUTH CAROLINA  
ANDERSON DIVISION  
C.A. No.: 8:12cv2365-TMC

Starr-Iva Water and Sewer District, )  
  )  
Plaintiff,                            )  
  ) DEFENDANT'S RENEWED MOTIONS  
v.                                     ) FOR SUMMARY JUDGMENT  
  )  
City of Anderson, a Municipality, )  
  )  
Defendant,                            )  
  )  
\_\_\_\_\_ )

**YOU WILL PLEASE TAKE NOTICE** that the Defendant City of Anderson, by and through its undersigned counsel, hereby renews its previously filed Motions for Summary Judgment pursuant to Rule 56.

These renewed Motions are based on the arguments, facts, exhibits, and authority as set forth in the Memorandum filed herewith in support of this Motion, including the fact that these same claims have been fully adjudicated in the Circuit Court for Anderson County, South Carolina in the case of *West Anderson Water District v. City of Anderson*, Civil Action No. 2012-CP-04-2770.

Respectfully submitted,

LOGAN, JOLLY & SMITH, LLP

s/James W. Logan, Jr.  
James W. Logan, Jr. (Fed ID #: 2712)  
James D. Jolly, Jr. (Fed ID #: 1410)  
P.O. Box 259  
Anderson, SC 29622  
1805 North Boulevard  
Anderson, SC 29621  
[logan@loganjollysmith.com](mailto:logan@loganjollysmith.com)  
[jolly@loganjollysmith.com](mailto:jolly@loganjollysmith.com)  
(864) 226-1910  
(864) 226-1931 (fax)

Frank H. Gibbes, III (Fed ID #: 2084)  
Gibbes Burton, LLC  
308 East St. John Street  
Spartanburg, SC 29302  
fgibbes@gibbesburton.com  
(864) 327-5000  
(864) 327-5001 (fax)

ATTORNEYS FOR THE DEFENDANT

Dated: July 25, 2016